

February 12, 2025

By ECF

The Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: The Roman Catholic Diocese of Rockville Centre, New York v. Arrowood Indemnity Company, et al., Case No. 21-cv-07706-AKH

Dear Judge Hellerstein:

Please accept this joint letter from the Roman Catholic Diocese of Rockville Centre, New York (the “Diocese”), Fireman’s Fund Insurance Company, Interstate Fire & Casualty Company, and National Surety Corporation (collectively, “Allianz”), and the DRVC Abuse Claims Trust (the “Trust”) in response to the Court’s November 12, 2024 Order (ECF No. 36).

On November 19, 2024, the Bankruptcy Court entered an order,¹ which among other things, approved the settlement agreements, release and buybacks with certain insurers and other parties. On December 4, 2024, the Bankruptcy Court entered an order² confirming the *Modified Chapter 11 Plan of Reorganization Proposed by The Roman Catholic Diocese of Rockville Centre, New York and Additional Debtors*, (as amended, the “Plan”),³ which became effective December 5, 2024.

The Parties are actively working to achieve certain conditions precedent to settlement payment outlined in the settlement agreements that were approved on November 19, 2024. Accordingly, the parties jointly request that the stay be continued until March 10, 2025. If the parties have not dismissed this action by that date, the parties request a further opportunity to update the court with regard to the status of their settlement and anticipated dismissal of this action.

This letter has been reviewed and approved by counsel for all parties.

Kind regards,

/s/ Timothy P. Law

Timothy P. Law
Reed Smith LLP
*On Behalf of the Roman Catholic
Diocese of Rockville Centre, New York*

¹ See *In re Diocese of Rockville Centre*, No. 20-12345-mg, ECF No. 3414.

² *Id.* at Dkt. 3465.

³ *Id.* at Dkt. 3447.

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/s/ Todd C. Jacobs

Todd C. Jacobs
Parker, Hudson, Rainer & Dobbs LLP
On Behalf of Allianz

/s/ Timothy W. Burns

Timothy W. Burns
Burns Bair LLP
*On Behalf of the DRVC
Abuse Claims Trust*